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November 22, 1996

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**Re: In the Matter of Advanced Television Systems and Their Impact upon the  
Existing Television Broadcast Service  
MM Docket No. 87-268**

Dear Mr. Caton:

Enclosed, on behalf of MARRI Broadcasting, LP, are an original and five copies of its comments in response to the Federal Communications Commission's Sixth Further Notice of Proposed Rule Making in the above-referenced proceeding.

Should there be any questions regarding this transmittal, kindly direct them to the undersigned.

Sincerely,



Jocelyn R. Roy

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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and Their Impact upon the )  
Existing Television )  
Broadcast Service )

MM Docket No. 87-268

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

COMMENTS OF MARRI BROADCASTING, LP

MARRI BROADCASTING, LP

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## **EXECUTIVE SUMMARY**

MARRI Broadcasting, LP ("MARRI") is a small business entity with television broadcast applications pending throughout the United States and the United States Virgin Islands mostly in small markets with vacant allocations that are located near major markets.

MARRI submits these comments to ensure that the Commission balances its statutory obligation to award television licenses in a manner that is fair and equitable with its laudable goal to award licenses for digital television services in a rapid fashion.

In awarding licenses for digital television service, MARRI believes that the Commission should foster the development of small business interests by allowing such entities to form partnerships to offer digital television on an interim basis. Finally, MARRI urges the Commission to make awards for interim or permanent authority to any entity that is technologically and financially able to begin offering service to the public before making any allotments for the provision of secondary service.

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In the Matter of )  
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Advanced Television Systems )  
and Their Impact upon the ) MM Docket No. 87-268  
Existing Television )  
Broadcast Service )

**COMMENTS OF MARRI BROADCASTING, LP**

MARRI Broadcasting, LP ("MARRI"), through its attorneys and pursuant to Section 1.415 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 1.415, hereby submits its comments to the *Sixth Further Notice of Proposed Rule Making* in the above-captioned proceeding.<sup>1/</sup>

**I. MARRI's Interest**

In 1996, principals with an attributable interest in MARRI Broadcasting, LP <sup>2/</sup> acquired the assets of, and received permission to transfer, the licenses of a television broadcast station and three radio broadcast stations in communities where these stations were and continue to be the only commercial broadcast service of its type licensed to those communities. Also in 1996, MARRI (or related entities) filed with the Commission applications to

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<sup>1/</sup> In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, Sixth Further Notice of Proposed Rule Making (released August 14, 1996) ("*Sixth Further Notice*").

<sup>2/</sup> See ownership information at Exhibit A.

construct the first or second commercial television broadcast station in thirty two communities and sought permission to construct TV stations in six Major Trading Areas ("MTAs") which, in its opinion, warrant additional service. The grant of several of these applications would eliminate white or gray area (Exhibits B and C hereto).

MARRI applied for vacant channels in accordance with the Commission's Television Table of Allotments. At the time of filing, MARRI believed itself to be the first applicant for most of these channels.<sup>2/</sup> None of the applications required MARRI to petition the Commission to amend the Table of Allotments. MARRI's applications were supported, where necessary, by requests for technical and/or legal waivers, which reflected MARRI's business strategy designed to develop underserved broadcast markets in the country.

MARRI was aware that the filing of its applications might encourage many other interested parties to file competing applications. Nonetheless, MARRI identified compelling business and public interest benefits in filing the applications. MARRI's business strategy regarding these

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<sup>2/</sup> In several instances MARRI came to learn with the publication of the October 1, 1996 "cut-off" list that some of the applications it had filed were the second or third that had been received at the FCC. Absent Public Notice of the acceptance of these applications for filing, MARRI filed its applications believing it was the first applicant of record.

stations was developed in reliance upon Commission rules and policies regarding the distribution of television allotments, well before the Commission adopted its *Sixth Further Notice*.

MARRI is excited about digital television ("DTV") and is eager, and financially able, to begin providing service to its proposed customer base via whatever DTV protocol that is ultimately adopted by the Commission. However, MARRI is concerned that the eligibility rules as proposed by the Commission will severely handicap small business owners such as MARRI by forcing them to sit out the beginning of the new digital revolution in television broadcast services, thereby placing them in a disadvantaged position vis a vis existing broadcasters, and forcing the communities which they propose to serve to once again wait for the technological revolution to reach their communities. Because MARRI will be affected by any final decisions the Commission adopts in this proceeding, it is an interested party. Accordingly, MARRI is pleased to have this opportunity to present these comments to the Commission.

## **II. Background**

Under the initial eligibility criteria established by the Commission, only existing full-service television broadcast station licensees, permittees authorized as of October 24, 1991, and parties with applications for a construction permit on file as of October 24, 1991, who are



ultimately awarded full-service broadcast licenses, will be eligible to receive a DTV allotment from the Commission.<sup>4/</sup> In order to allocate spectrum to existing broadcasters so that they may begin providing DTV services with comparable coverage, the Commission proposes to delete all vacant NTSC channel allotments and imposed a freeze on the filing of applications for those channels effective thirty days after the publication of the *Sixth Further Notice* in the *Federal Register*.<sup>5/</sup>

The Commission stated that it does not believe that these applications will have a significant negative impact upon the DTV allotments but reserved the right to deny any applications if it believes that a grant will not serve the public interest.<sup>6/</sup> Applications for television broadcast stations which do not fall within the parameters established

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<sup>4/</sup> In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, Second Report and Order and Further Notice of Proposed Rule Making, 7 FCC Rcd 3340, 3341 (1992) ("*Second Report and Order*"). The Commission also adopted a plan for ranking eligible entities for the allocation of DTV channels in case there was not enough spectrum for full accommodation but now says that it believes that all eligible broadcasters will be able to be accommodated. *Sixth Further Notice* at note 12.

<sup>5/</sup> *Sixth Further Notice* at ¶ 60. The *Sixth Further Notice* was published on August 21, 1996. The freeze became effective as of the close of business on September 20, 1996. The Commission intends to follow established procedures inviting the filing of competing applications for those channels which have not already appeared on an "A" cut-off list. *Ibid.*, ¶ 106.

<sup>6/</sup> *Sixth Further Notice* at ¶ 60.

by the Commission in its *Second Report and Order* will, if their applications are granted, receive only NTSC channels and must wait for at least a period of two years before they are eligible to receive any DTV allotments.<sup>2/</sup>

### III. Discussion

- A. ***The Commission has a statutory obligation to ensure that, in order to satisfy a demand for radio communications services, licenses and frequencies are awarded in a manner that ensures a "fair, efficient and equitable distribution"***

The Commission's obligation to ensure that licenses for radiocommunications services are awarded in a manner addressing demand and that ensures a fair and equitable distribution, in accordance with the public interest, is statutorily mandated.<sup>3/</sup> The Commission accorded great weight to this mandate when it revised its broadcast rules in 1952 to amend the television Table of Assignments.<sup>4/</sup> In proposing the Table of Assignments, the Commission stated that it:

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<sup>2/</sup> The Commission has stated that new entrants will be able to apply for DTV channels only after the initial assignment period has ended; the initial assignment period is two years. *Second Report and Order* at ¶ 7.

<sup>3/</sup> "In considering applications for licenses, and modifications and renewals thereof, when and insofar as there is demand for the same, the Commission shall make such distribution of licenses, frequencies, hours of operation, and of power among the several States and communities as to provide a fair and efficient, and equitable distribution of radio service to each of the same." The Communications Act of 1934, as amended, (the "Act"), 47 U.S.C. § 307 (b).

<sup>4/</sup> See *In the Matter of Amendment of Section 3.606 of the Commission's Rules and Regulations*, Docket Nos. 8736 and 8975, Sixth Report and Order, 1 RR 91:601 (Pike and Fischer) (1952) ("Sixth Report on Television Allocations").

endeavored to meet the twofold objective set forth in Sections 1 and 307 (b) of the Communications Act of 1934, to provide television service, as far as possible to all people of the United States and to provide a fair, efficient and equitable distribution of television broadcast stations to the several states and communities.<sup>10/</sup>

Moreover, the Commission attempted to achieve these goals by establishing certain priorities:

(1) [t]o provide at least one television service to all parts of the United States; (2) [t]o provide each community with at least one television broadcast station; (3) [t]o provide a choice of at least two television services to all parts of the United States; (4) [t]o provide each community with at least two television broadcast stations and (5) any channels which remain unassigned under the foregoing priorities will be assigned to the various communities depending on the size of such community, and the number of television services available to such community from television stations located in other communities.<sup>11/</sup>

It is indisputable that this statutory mandate has resulted in the Commission's long-standing legal history of taking into consideration the particularized needs of a local community when awarding licenses in order to provide a fair and equitable distribution of services.<sup>12/</sup> While the Commission's TV Table of Assignments has been amended many times over to add or delete channels to more effectively meet the needs of particular communities, the underlying

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<sup>10/</sup> Id. at 91:620.

<sup>11/</sup> Id.

<sup>12/</sup> See e.g. FCC v. Allentown Broadcasting Corp., 349 U.S. 358 (1955); and Pasadena Broadcasting Co. v. FCC, 555 F.2d 1046 (D.C. Cir. 1977).

principle of providing a fair and equitable distribution of service has not been diminished and is no less important today.

Although the Commission's policy of localism is not rigidly applied so as to require every communications service authorized by the Commission to be tied to a local community, thereby depriving the greater public of radiocommunications services that achieve technological advances and innovation,<sup>11/</sup> the Commission cannot simply abdicate its Section 307 (b) obligation to provide a fair and equitable distribution of communications services.

The Commission took seriously its Section 307 (b) responsibilities when amending the Table of Assignments in 1952 and when making subsequent changes to the Table of Assignments in order to achieve the public interest goals of providing an overall equitable distribution of facilities.

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<sup>11/</sup> See National Ass'n of Broadcasters v. FCC, 56 RR2d 1105 (1984) (Pike and Fischer), challenging the FCC's Interim Direct Broadcast Satellite ("DBS") Service rules and an actual DBS application ("we do not think it so shortsighted as to preclude new technology that offers the promise of substantial public benefit. The plain language of the Act does not compel such impractical consequences"). MARRI notes, however, that the provision of DBS service did not operate to eliminate the method whereby residents were able to receive local service. DBS simply provided, among other things, an avenue for areas in which it was inefficient to provide conventional broadcasting a means to receive television signals. In contrast, the Commission proposes in this proceeding to remove or significantly delay, for many communities, the opportunity to receive local service which could have been provided to them.

In 1952, the Commission found that the Table of Assignments would:

[m]ake for the most efficient technical use of the relatively limited number of channels available for the television service. It protects the interests of the public residing in smaller cities and rural areas more adequately than any other system for distribution of service and affords the most effective mechanism for providing for non-commercial educational television. It permits the elimination of certain procedural disadvantages in connection with the processing of applications which would otherwise unduly delay the overall availability of television to the people.<sup>14</sup>

If MARRI is awarded FCC licenses in the communities for which it currently has applications pending, it will provide a first local transmission service to twenty-seven communities, a second local transmission service to six communities and in several cases eliminate white and gray area.<sup>15</sup> Moreover, the population in most of these communities has been steadily increasing, thereby increasing the demand for new television service.<sup>16</sup> For those

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<sup>14</sup> Sixth Report on Television Allocations at 91:604.

<sup>15</sup> MARRI's proposed service is described at Exhibit B.

<sup>16</sup> See population growth chart at Exhibit C, listing the communities for which MARRI seeks a broadcast license. As an example of the importance of MARRI's proposed service, MARRI notes that in the United States Virgin Islands, where it has an application pending for Channel 43 in Charlotte Amalie, the residents receive, via a satellite-delivered cable, a Superstation from New York which may provide information to the residents regarding rush hour traffic near Rockefeller Center, but would not receive from that station critical information regarding the approach of a hurricane which is dangerous to the lives of the people on the island and their property.

communities, the benefits of receiving new television broadcast service will be incalculable. MARRI is concerned that if the Commission exercises its discretion not to award a license for a vacant channel,<sup>12/</sup> these communities may never receive local service.<sup>13/</sup>

MARRI reminds the Commission that it must square its responsibilities under Section 307 (b) with any discretion it exercises not to award a license for an NTSC television station, particularly in those areas for which the demand for service is great. If the Commission desires to eliminate vacant channel allotments, it must do so in a manner which takes into consideration the relative needs of the communities that will suffer the loss. Although the goals of the Commission, to provide the public with advanced technological services as rapidly as possible, are laudable, the Commission also has an obligation to engage in reasoned decision-making<sup>14/</sup> when carrying out these goals. The

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<sup>12/</sup> The Commission stated that it "reserves the right, in specific cases, to determine that the public interest is better served if the [applications for new NTSC TV stations] are not granted, granted only if amended to specify reduced facilities, or granted only with a condition that limits the interference that the station would be allowed to cause." *Sixth Further Notice* at ¶ 60.

<sup>13/</sup> As a further testament to the demand for television broadcast channels, MARRI has attached at Exhibit D a list of pending applications for television allotments. As of November 14, 1996, there were circa 683 applications pending for 183 vacant commercial allotments.

<sup>14/</sup> See Greater Boston Television, Corp. v. FCC, 444 F.2d 841 (D.C. Cir. 1970), cert. denied 403 U.S. 923 (1971); and WAIT Radio v. FCC, 418 F.2d 1153 (D.C. Cir. 1969).

failure to do so would be arbitrary and capricious and an abuse of administrative discretion.

**B. DTV allotments should be made to those entities that are able to provide service in the most expeditious manner possible**

Because MARRI's applications were not on file with the Commission prior to the eligibility cut-off necessary to receive a DTV allotment, the residents in those communities for which MARRI is granted a license will only receive NTSC service and will have to wait at least two years before MARRI is eligible to provide DTV service,<sup>28/</sup> and yet another period of time before MARRI is able to build out its DTV system. MARRI submits that this will result in a highly inefficient method of providing service to the residents of those communities. Should MARRI be awarded Commission licenses, it is ready, willing and able to begin construction of facilities to offer DTV services in a rapid fashion.

This rapid delivery of DTV services would be in full accord with the Commission's and Congress' goals of speeding the delivery of innovative services to the public. The Commission noted in its *Second Report and Order* that "existing broadcasters" continued involvement in ATV is the most practical, expeditious, and non-disruptive way to bring

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<sup>28/</sup> Supra, note 7.

improved service to the American public." <sup>21/</sup> In addition, the Commission found that:

[e]xisting broadcasters possess the know-how and expertise necessary to implement ATV swiftly and efficiently. They have invested considerable resources in the present system and represent a large pool of experienced talent. As initial participants in the transition to ATV, existing broadcasters will be making an appreciable capital investment in this new technology and will undertake the business risk associated with being in the forefront of such new developments." <sup>22/</sup>

MARRI notes that many of the existing licensees which are eligible to receive DTV allotments may not be able to obtain the financial commitments necessary to provide DTV service. This is evident by an examination of the number of extensions of construction permits that the Commission has granted to licensees unable to build their NTSC facilities. In fact, the Commission accedes that "a number of digital allotments will go to licensees that do not now have functional television stations, or stations operating at full power, but rather to licensees that, prior to 1991, received construction permits to build or modify NTSC stations but have not yet done so." <sup>23/</sup> The Commission has raised concern about the issue of awarding transition channels to broadcasters that are "in bankruptcy, off-the-

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<sup>21/</sup> Second Report and Order at ¶ 6.

<sup>22/</sup> Second Report and Order at note 11.

<sup>23/</sup> Sixth Further Notice at ¶ 33.



air, have constructions permits or are otherwise non-operational, or otherwise incapable of engaging in the transition to digital television."<sup>24/</sup> Allowing these entities to receive DTV allotments when they were unable to successfully implement NTSC service is fundamentally unfair and not in accordance with the public interest.

In order to speed the delivery of DTV services to the public, the Commission should award DTV allotments to those entities most qualified to implement the delivery of DTV services in the most expeditious manner possible. Although Congress has directed the Commission to limit the eligibility for advanced television licenses to existing broadcast licensees,<sup>25/</sup> the Commission may, in accordance with the 1996 Act, grant DTV channels to any party eligible at the time the actual DTV allotments are made. Accordingly, if MARRI's applications are granted prior to the Commission's issuance of DTV allotments, it should be

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<sup>24/</sup> *In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MM Docket No. 87-268 Fourth Further Notice of Proposed Rule Making, 10 FCC Rcd 10540 (1995) ("*Fourth Further Notice*") at ¶ 32.

<sup>25/</sup> Section 201 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, to be codified at 47 U.S.C. §§ 151 et seq. added Section 336 to provide that: "(a) [i]f the Commission determines to issue additional licenses for advanced television services, the Commission (1) should limit the initial eligibility for such license to persons that, **as of the date of such issuance**, are licensed to operate a television broadcast station or hold a permit to construct such a station (or both)..." (emphasis added).

eligible for such allotments. A failure by the Commission to adopt an inclusive methodology of allocating DTV channels will result in many DTV allotments being received by entities that are in no way prepared to deliver DTV services, counter to the goals of the Commission and Congress.<sup>26/</sup>

To address Commission concern that enough spectrum will be available to make the initial DTV allotments, MARRI notes that the Commission has already considered that it may not be necessary to require broadcasters to engage in a period of operation of both an NTSC and an ATV facility: "[i]n the event that we were not able to accommodate all eligible existing broadcasters with an ATV channel, there are other options, such as switching directly to ATV service at some point during or at the end of the transition period without first requiring a period of operation by the broadcaster of both an NTSC and an ATV facility."<sup>27/</sup> Although the Commission concluded in this *Sixth Further Notice* that enough spectrum would indeed be available to accommodate existing broadcasters,<sup>28/</sup> the Commission should consider this

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<sup>26/</sup> Chairman Hundt recently acknowledged that "[t]ime is on the side of the first movers in all digital businesses. That's why the FCC needs to get licenses for Digital TV out next year." A NEW PARADIGM FOR DIGITAL TELEVISION, speech by Chairman Reed Hundt delivered on September 30, 1996 at the Digital Convergence: Reshaping the Media conference in New York.

<sup>27/</sup> *Fourth Further Notice* at note 24.

<sup>28/</sup> *Supra*, note 6.

option with respect to broadcasters receiving NTSC allotments that are not eligible under the Commission's proposed guidelines to receive DTV allotments.

**C. *Small businesses should be allowed to form partnerships for the purpose of providing service***

The Commission has encouraged the use of negotiations between broadcasters to devise alternative allotment approaches consistent with the specific needs of the broadcaster in the community it serves,<sup>29/</sup> and to develop proposals for the elimination of interference.<sup>30/</sup> MARRI suggests that the Commission similarly adopt rules which will allow small business broadcast owners the opportunity to form partnerships for the purpose of pooling their resources to speed the delivery of DTV services in designated areas of the country.<sup>31/</sup> MARRI has developed a proposal which would allow negotiation among mutually

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<sup>29/</sup> Id. at ¶¶ 44-49.

<sup>30/</sup> Id. at ¶ 41.

<sup>31/</sup> MARRI notes that the Commission, in a separate proceeding has requested comments on a proposal to allow waivers of the Commission's rules to allow joint ownership of stations that (1) have a very small audience or advertising shares and (2) are located in a very large market where (3) a specified number of independently owned voices remain post-merger in order to enhance competition in the local market by allowing small stations to share costs and compete more effectively. *In the Matter of the Commission's Regulations Governing Television Broadcasting*, MM Docket No. 91-221, Second Further Notice of Proposed Rule Making, (released November 7, 1996). MARRI is supportive of efforts to enhance the market position of small broadcasters and encourages the Commission to adopt rules based upon similar principles in this proceeding.

exclusive applicants in order to develop a plan to provide DTV service which would best serve the public interest. Such a plan would further the Commission's and Congress' goals of furthering the participation of small business owners in the delivery of communications services while advancing the delivery of DTV services.

The Commission is familiar with the public interest benefits of this approach through the use of its interim operating authority. Although interim operating authority is generally granted when a broadcast license has been revoked in order to provide uninterrupted service to the public,<sup>12/</sup> use of such an approach could also advance the delivery of advanced television services as well. If small business partnerships are not permitted, small companies seeking to operate in smaller communities are disadvantaged by not being able to function in rapidly maturing operating environments.

MARRI has submitted the details of its plan in a separate response to the Commission's Initial Regulatory Flexibility Analysis ("IRFA") regarding the affect of this proceeding on small businesses and requests that the

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<sup>12/</sup> See e.g. *In re Applications of Orion Communications, LTD. for Construction Permit for FM Broadcast Station WZLS Biltmore Forest, North Carolina: Biltmore Forest Radio, Inc. for Construction Permit for Joint Interim Operating Authority*, File Nos. BPH-870901ME, BPIH-950707MD, Memorandum Opinion and Order, (released October 3, 1996).

Commission incorporate those comments and the specifics of MARRI's plan herein by reference.<sup>13/</sup>

**D. The Commission should first award any vacant channel allotments to entities that are able to provide service prior to making any allotments for secondary services**

The Commission acknowledges that even after all of the initial DTV allocations are made, some channels will be vacant in certain geographic areas during the transition, and more after the transition.<sup>14/</sup> The Commission requests comments on how to allocate this spectrum.

If the Commission decides not to include applicants with applications for construction permits on file after October 24, 1991 in its initial allocation of DTV channels, MARRI suggests that, in the alternative, the Commission consider this group of applicants in its distribution of channels before considering the allocation of these channels to any secondary service, such as low power television ("LPTV") stations or television translator stations. In addition, every effort should be made to make these allocations during the initial distribution period and not after the transition period in order to further the goal of implementing DTV service as quickly as possible.

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<sup>13/</sup> A copy of MARRI's Comments to the Initial Regulatory Flexibility Analysis including its proposed Small Business Partnership Plan are attached at Exhibit E.

<sup>14/</sup> Sixth Further Notice at ¶ 51.

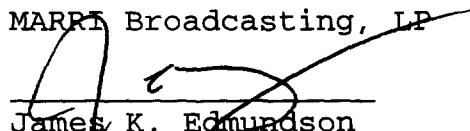
#### IV. Conclusion

MARRI urges the Commission not to deprive entities that are willing and able to deliver DTV services the opportunity to compete in this new marketplace. The Commission has an overriding statutory obligation to ensure a fair, efficient and equitable delivery of communications services nationwide. Adopting policies of exclusion will not "accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services to all Americans by opening all telecommunications markets to competition."<sup>15/</sup> Accordingly, MARRI urges the Commission to seriously consider the proposals contained herein.

Respectfully submitted,

MARRI Broadcasting, LP

By:

  
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Dated: November 22, 1996

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<sup>15/</sup> Preamble, 1996 Act.

**A**

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**MARRI Broadcasting, L.P.**

**BROADCAST OWNERSHIP INTERESTS  
AND APPLICATIONS**

MARRI Broadcasting, L.P., (hereafter "MARRI") is a Delaware limited partnership comprised of MARRI Broadcasting Corp. (General Partner; 1% equity) and the Figgie Family Equity Fund, Ltd., L.L.C., (Limited Partner; 99% equity). MARRI principals are officers, directors, and/or beneficial owners of Alpha Broadcasting Corporation, licensee of full-power television broadcast Station WSVI, Christiansted, St. Croix, United States Virgin Islands and low-power television broadcast station WFIG-LP, Charlotte Amalie, U.S.V.I.

MARRI principals are also officers, directors, and/or beneficial owners of BGI Broadcasting, L.P., (hereafter "BGI") licensee of FM broadcast Station WCTH, Plantation Key, Florida, and of standard broadcast Station WSWN and FM broadcast Station WBGF, Belle Glade, Florida.



MARRI (and related companies -- BGI and MARRI Broadcasting Corporation) has pending the following applications for authority to construct and operate new television broadcast stations:

<b>Channel</b>	<b>Community of License</b>	<b>Filing Date</b>
Channel 64	Destin, Florida	April 5, 1996
Channel 51	Marianna, Florida	June 27, 1996
Channel 15	Christiansted, St.Croix, U.S.V.I.	July 3, 1996
Channel 64	Inverness, Florida	July 11, 1996
Channel 43	Charlotte Amalie, St. Thomas, U.S.V.I.	July 18, 1996
Channel 49	El Dorado, AK	July 22, 1996
Channel 18	Farwell, TX	July 22, 1996
Channel 29	Selma, AL	July 23, 1996
Channel 30	Odessa, TX	July 24, 1996
Channel 61	Mobile, AL	July 25, 1996
Channel 55	Gulf Shores, AL	July 25, 1996
Channel 52	Tuscumbia, AL	Sept. 20, 1996
Channel 20	Bishop, CA	Sept. 20, 1996
Channel 35	Warner Robins, GA	Sept. 20, 1996
Channel 69	Paintsville, KY	Sept. 20, 1996
Channel 51	Jackson, MS	Sept. 20, 1996
Channel 34	Magee, MS	Sept. 20, 1996
Channel 28	McComb, MS	Sept. 20, 1996
Channel 3	Ely, NV	Sept. 20, 1996
Channel 6	Ely, NV	Sept. 20, 1996
Channel 7	Goldfield, NV	Sept. 20, 1996
Channel 9	Tonopah, NV	Sept. 20, 1996
Channel 67	High Point, NC	Sept. 20, 1996